

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JENNIFER STRANGE and MAGEN MORRIS,

Plaintiff,

v.

LES SCHWAB TIRE CENTERS OF  
WASHINGTON, INC., et al.,

Defendant.

CASE NO. C06-0045RSM

SPECIAL VERDICT FORM

WE THE JURY, answer the following questions submitted by the Court as follows:

QUESTION NO. 1

Did defendant Les Schwab Tire Centers discriminate against either or both of the plaintiffs on the basis of sex by denying her opportunities for promotion or training for promotion to the position of Assistant Manager after January 13, 2003?

a. Jennifer Strange: Yes \_\_\_\_\_ No X

b. Magen Morris: Yes \_\_\_\_\_ No X

SPECIAL VERDICT FORM



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**QUESTION NO. 2**

Did defendant Les Schwab Tire Centers retaliate against either or both plaintiffs in violation of Washington State law?

a. Jennifer Strange: Yes X No       

b. Magen Morris: Yes X No       

**QUESTION NO. 3**

Did defendant Les Schwab Tire Centers constructively discharge either or both plaintiffs in violation of Washington State law?

a. Jennifer Strange: Yes        No X

b. Magen Morris: Yes        No X

**QUESTION NO. 4**

Did defendant Les Schwab Tire Centers retaliate against either or both plaintiffs in violation of federal law?

a. Jennifer Strange: Yes X No       

b. Magen Morris: Yes X No       

**QUESTION NO. 5**

Did defendant Les Schwab Tire Centers constructively discharge either or both plaintiffs in violation of federal law?

a. Jennifer Strange: Yes        No X

b. Magen Morris: Yes        No X

**If you answered "yes" to any Question 1, 2, 3, 4, or 5, proceed to Question 6. If you answered 'no' to Questions 1, 2, 3, 4, and 5 please skip the remaining questions, and sign and date the Verdict.**

**SPECIAL VERDICT FORM**

1 QUESTION NO. 6

2 If you found for either plaintiff in any of the questions set forth above, what is the amount of  
 3 damages you award to that plaintiff for each of the following:

4 a. Jennifer Strange:

5 (1) Past economic damages:

\$ 0

6 (2) Future economic damages:

\$ 0

7 (3) Past and future emotional distress:

\$ 42,6008  
9 b. Magen Morris

10 (1) Past economic damages:

\$ 0

11 (2) Future economic damages:

\$ 0

12 (3) Past and future emotional distress:

\$ 42,600

13  
 14 If you answered "yes" to either Question 4 or 5, proceed to Question 7. If you answered  
 15 "no" to both Questions 4 and 5, please skip the questions below, and sign and date the Verdict.

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17 QUESTION NO. 7

18 Do you find that defendant Les Schwab Tire Centers should be punished for its actions by  
 19 awarding punitive damages?

20 Answer: Yes X No \_\_\_\_\_

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 22 If you answer "yes" to Question 7, proceed to Question 8. If you answered "no" to Question 7,  
 23 please sign and date the Verdict.

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 28 SPECIAL VERDICT FORM

1 QUESTION NO. 8

2 What amount of punitive damages do you award to either plaintiff?

3 a. Jennifer Strange:

\$ 100,000

4 b. Magen Morris:

\$ 100,000

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6 **PLEASE SIGN AND DATE THE VERDICT.**

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8 DATED this 9 day of November, 2009.

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11 Harmony Wallsmith  
12 PRESIDING JUROR  
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28 **SPECIAL VERDICT FORM**